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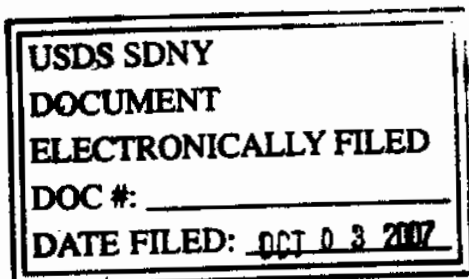
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September 25, 2007



Our ref: 158-07/PJG/PLS
October 31, 2007
Application **GRANTED**
SO Ordered
Paul M. Crotty

BY HAND

The Honorable Paul A. Crotty
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

RE: **Seatrek Trans Pte Ltd v. Meghna Cement Mills Ltd.**
07 CV 5543 (PAC)

Dear Judge Crotty:

We represent the plaintiff in the captioned matter and write to request an additional 60 days to serve the defendant with a copy of the Summons and Verified Complaint. This is our first request for such relief.

By way of background, Plaintiff initiated this action as an ancillary matter to London proceedings, seeking security for its maritime claims via an attachment of the defendant's property in this District pursuant to Rule B. The requested Rule B attachment was granted, but Plaintiff has yet to be successful in restraining funds though efforts to do so are continuing. If we were to notify the defendant of these proceedings now, before any property is restrained, it would defeat the purpose for which the attachment was sought and this Court's Order issued.

We therefore respectfully request that we be granted an extension of time to serve the defendant with the Complaint for a period of 60 days, up to and including, December 10, 2007. We note that Local Admiralty Rule B.2 recognizes the importance of keeping Rule B actions *ex parte* until property is actually restrained, and provides that notice of

MEMO ENDORSED

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the attachment is not required to be given to the defendant until after its property has been restrained.

We thank the Court for its attention to this matter.

Respectfully submitted,
FREEHILL HOGAN & MAHAR, LLP



Peter J. Gutowski
Pamela L. Schultz

PLS:lu